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8/20/2021
The September 16, 2021
conference is adjourned to
September 28, 2021 at 3:30
PM. SO ORDERED.



August 18, 2021

Hon. Paul A. Crotty
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Vieira v. Headley*, 21-CV-00648 (PAC)

Dear Judge Crotty,

I am writing, on behalf of plaintiffs, to request adjournment of the status conference which is scheduled for September 16, 2021, at 11:30 AM, because that day is a religious holiday, Yom Kippur. Defendants consent to this request and to the proposed scheduling order.

This is plaintiffs' first request for an adjournment. On July 19, 2021, defendants requested an adjournment of the status conference, which was then scheduled for July 21, 2021, and plaintiffs consented. (Doc. 13) Because of the emergency nature of the request, the defendants did not propose a specific date. This Court granted the request (Calendar Entry, July 20, 2021) and *sua sponte* selected the date of September 16, 2021, for the conference.

Pursuant to Rule #1E of this Court's rules, plaintiffs propose the following three dates for the conference: September 22, 2021; September 23, 2021; September 28, 2021. Defendants' attorney is available on all of those dates.

The requested adjournment may affect this Court's Scheduling Order, dated May 27, 2021 (Doc. 12). Although both parties served initial Rule 26(a) disclosures and document requests, the defendants have been unable to respond to plaintiffs' document requests, due to the cyberattack on the New York City Corporation Counsel and the unexpected departure of the previous Assistant Corporation Counsel assigned to the case, but will respond by September 15, 2021. Without being able to review defendants' documents, plaintiffs are unable to serve requests for admissions. Moreover, the parties cannot begin depositions until paper discovery has been completed, and consequently may not be able to complete depositions by the October 8, 2021, deadline. Accordingly, plaintiffs request that the scheduling order be modified. A proposed modified order is attached.

Thank you for your consideration.

Very truly yours,

S/ Carolyn A. Kubitschek
Carolyn A. Kubitschek

CAK/mt
encl.